

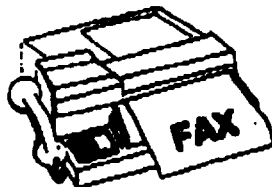


ILLINOIS
ENVIRONMENTAL
PROTECTION AGENCY

P.O. Box 19276
2200 Churchill Road
Springfield, IL 62794-9276

REMEDIAL PROJECT MANAGEMENT SECTION

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**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276

Mary A. Gade, Director

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(217) 782-9143 (TDD)

March 20, 1998

Mr. Michael A. Pierle
Vice President
Solutia, Inc.
10300 Olive Boulevard
Post Office Box 66760
St. Louis, Missouri 63166-6760

Re: L1630200005 - St. Clair County
Sauget Area 1 Sites/Sauget & Cahokia

Dear Mr. Pierle:

Thank you for your telephone call of March 3, 1998 in which you had described Solutia's willingness to perform remedial actions at the Sauget Area 1 Sites. As you know, the Illinois Environmental Protection Agency ("Illinois EPA") expects that the Sauget Area 1 Sites will be finalized on the National Priorities List (NPL) by the end of this federal fiscal year. Illinois EPA has made every possible attempt to address the complicated human health and environmental issues that relate to these sites in programs outside of Superfund, however, our success has been limited. With the notable exception of the removal action Cerro Copper Products performed at the highly contaminated "Creek Segment A" portion of Dead Creek, Illinois EPA has not been successful in obtaining the necessary agreements to perform other NPL consistent removal actions at the Sauget Area 1 Sites.

Over the course of our telephone conversation, we had reiterated the reasons why Solutia's proposal to perform remedial actions at Dead Creek were unacceptable. These reasons were outlined in our written correspondence to Mr. D. Michael Light of your firm dated October 22, 1997 and Bill Child's followup conversations with Mr. Light.

Illinois EPA fully understands that the process by which sites are studied and remedies selected within the Superfund program is long, but we have and will continue to make every attempt to shorten this process. We have in fact already submitted a Statement of Work to Solutia that outlines the technical framework for which a Remedial Investigation and Feasibility Study ("RI/FS") will be performed at the Sauget Area 1 Sites. We have also submitted a draft consent decree to Solutia's counsel which will form the basis for negotiations to govern the performance of the RI/FS. Senior Assistant Attorney General James L. Morgan of the Illinois Attorney General's Office is representing the Illinois EPA in this matter. Please have your counsel contact him to arrange for further discussions regarding the draft consent decree. In consideration of the

Mr. Michael A. Picrle

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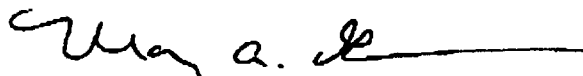
technical data that already exists and the present comprehensive understanding of what additional data needs to be collected, the Agency anticipates that the RI/FS can be concluded in a very short timeframe.

The types of cleanups that will be performed at the Sauget Area 1 Sites must meet the nine evaluation criteria discussed in Section 300.430(e)(9) of the National Contingency Plan. As Solutia appears to be willing to perform cleanups at this early stage, the only part of the Sauget Area 1 Sites where sufficient site data exists to best determine what type of cleanup would meet these criteria would be a portion of Dead Creek commonly known as "Creek Segment B". This segment of Dead Creek was the focus of a study leading to a removal action which Monsanto was evidently willing to perform in 1991. Illinois EPA believes that if Solutia is serious in performing cleanup at this early stage, Solutia should begin steps toward performing a removal action at Creek Segment B right away. Appropriate language is not presently in the draft consent decree, but can be incorporated to allow for a removal action to be performed at Creek Segment B.

It is our understanding that Solutia had previously planned to initially go forward on its own in addressing the Sauget Area 1 Sites. However, you inquired into the status of other potentially responsible parties. The Illinois EPA has been investigating the involvement of other potentially responsible parties at the Sauget Area 1 Sites on an ongoing basis. We would be willing to issue notices of potential liability to any known potentially responsible party. Toward this end, however, we request that all information currently in Solutia or Monsanto's possession regarding the identity or involvement of potentially responsible parties be forwarded to the Illinois EPA in order to assist us in that effort.

I am confident that an agreement on these and other matters can be reached over the course of consent decree negotiations and believe that if Solutia is willing to quickly and appropriately address the data needs that exist at these sites, the implementation of remedies that will address this serious contamination is not far off.

Sincerely,



Mary A. Gade
Director

cc: Joseph G. Nassif
James L. Morgan

bc: Marsha Fanale
Division File
Terry Ayers
Paul Takacs